

THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

LIVEVIDEO.AI CORP

*Plaintiff,*

vs.

C.A. NO. 1:24-CV-06290

**REPLY AND AFFIRMATIVE RELIEF  
REQUESTING ADDITIONAL JUDICIAL  
NOTICE**SHARI REDSTONE,  
NATIONAL AMUSEMENTS, INC.,  
CHRISTINE VARNEY,  
MONICA SELIGMAN,*Defendant's.*

/

In reply to defendant's July 24 Response Letter (Dkt 157) To Plaintiff's Request For Judicial Notice and for affirmative relief requesting this Honorable Court take judicial notice of two new facts that have occurred since Plaintiff filed its Request For Judicial Notice. (Dkt 156).<sup>1</sup>

**Reply To Defendant's Response**

Defendants core argument opposing Plaintiff's requested judicial notice is they are not related to the matter before this Court, however the relevancy is an easy point to prove. The facts raised in the last request for judicial notice and this additional notice herein, are evidence exposing the defendants' integrity failures, legal disregard, and habitual stonewalling. This confirms the pattern shown in this case just as they ignored Plaintiff's November 2024 complaint and Congress's May 2025 request, a recent Congressional Inquiry. These facts shed new light on the defendants' lack of integrity, their disregard for legal obligations, and their habitual stonewalling in matters of public and governmental importance. These are facts which are not only relevant but imperative for ensuring justice is served. The Congressional Inquiry adds a layer of accountability that this Court cannot ignore. This Court has an obligation—a duty—to enforce compliance when defendants blatantly disregard Congressional demands. This is not merely about technicalities; it's about respect for the rule of law.

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<sup>1</sup> Plaintiff re-incorporates by reference judicially noticed fact #2 from its Request For Judicial Notice regarding the missed June 2nd Congressional Demand, production date deadline.

### **Additional Facts This Court May Take Judicial Notice Of**

Under the authority of FRCP Rule 201 this Court may take judicial notice of two new facts cited herein. This new evidence is not just a procedural matter—it represents a critical turning point. It confirms beyond doubt that granting any public interest benefits to the defendants would be reckless and unwarranted. Defendants NAI and Paramount—both controlled by Shari Redstone—failed to respond in a timely manner to the June 2nd Congressional demand. This is not an isolated incident. It's part of a troubling pattern. This Court can clearly see how these defendants have chosen to operate, when served with Plaintiff's November 2024 complaint, they ignored it—just as Shari Redstone herself chose to ignore Congress's May 2025 demand. Skydance, the company poised to acquire NAI's shares, is now under scrutiny as well. A new Congressional Inquiry launched just last week—targets Skydance directly which has also failed to respond. NAI controls Skydance because contractually it has the power to determine when and how Skydance responds—or fails to respond—to government regulators. This is not just a matter of ignoring deadlines; it's a coordinated effort to evade accountability on multiple fronts.

Three highly esteemed Senators have now publicly weighed in on this matter, underscoring its gravity. The Court must consider this information when it considers any public interest determinations regarding the defendants, while also considering the fact the Plaintiff is not the target of any Congressional Inquiry that includes unfulfilled production requests that have not met the deadline set by Congress. The contrast could not be clearer.<sup>2</sup>

1. July 23, 2025 “CONGRESSIONAL CORRESPONDENCE” filing case #24-275 (Ex. 1)  
<https://www.fcc.gov/ecfs/search/search-filings/filing/10723133656643>  
 Submits U.S. Senator Elizabeth Warren's July 21, 2025 Congressional Inquiry To Skydance LLC CEO seeking production of materials by August 4, 2025.<sup>3</sup>

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<sup>2</sup> Defendant NAI's counterparty in stock purchase agreement, Skydance LLC, has an August 4, 2025 deadline to respond to its Congressional inquiry.

<sup>3</sup> “To understand the nature of any payments to President Trump, and whether these payments comply with our nation’s anti-bribery laws, we ask that you answer the following questions by August 4, 2025:

2. July 21, 2025 Congressional Demand For Production. (Ex. 2)  
 Senators Elizabeth Warren, Bernie Sanders, Ron Wyden

“We write with questions about Skydance Media’s reported secret side deal with President Trump that appears to be connected to Paramount Global’s efforts to settle President Trump’s lawsuit against CBS and secure approval for its mega-merger with Skydance.<sup>1</sup>”

“President Trump himself, however, apparently revealed that the arrangement is worth more than the initially reported \$16 million — reporting suggests the Paramount settlement arrangement may involve an additional back-door deal with President Trump.<sup>13</sup> President Trump has stated that the settlement was worth “about \$16 million plus 16 million, or maybe more than that in advertising... So it’s like \$32 [million] to maybe \$35 million.”<sup>14</sup> This admission appears to corroborate reporting that claims you reached a “side deal” with the President, the terms of which involve CBS airing public service announcements “and other broadcast transmissions” worth between \$15 million and \$20 million that “support conservative causes supported by President Trump.”<sup>15</sup> The nature and existence of this arrangement are uncertain, with at least one anonymous source calling the reports “false.”<sup>16</sup>

On July 17, CBS announced it was canceling The Late Show with Stephen Colbert, the most-watched show on late night television.<sup>17</sup> CBS announced this decision just three days after Colbert criticized Paramount’s \$16 million settlement with President Trump on his show, saying the deal resembled bribery.”

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1. Is there currently any arrangement under which you or Skydance will provide compensation, advertising, or promotional activities that in any way assist President Trump, his family, his presidential library, or other Administration officials?
  - a. If so, what is the nature of this arrangement? What will you or Skydance provide, and what have you discussed receiving in return from the Trump Administration?
  - b. Have any Skydance board members been involved in any of these discussions, or have you been involved in these discussions only in your personal capacity?
2. Have you personally discussed with President Trump, any of his family members, any Trump Administration officials, or presidential library fund personnel any matters related to the Paramount-Skydance transaction? If so, what was the nature of these discussions?
3. Were you or any other Skydance executives involved in discussions about settling President Trump’s lawsuit against CBS? If so, please provide information regarding the timing, nature of, and participants in these discussions, including whether the pending transaction with Paramount was discussed.
4. Has Skydance agreed or have you personally agreed to make changes to Skydance’s content or Paramount’s or CBS’s content at the request of the Trump Administration, to facilitate approval of the transaction? If so, please describe those requests.
5. Were you or other Skydance executives involved in discussions about canceling The Late Show with Stephen Colbert? If so, please provide information regarding the timing, nature of, and participants in these discussions, including whether the pending transaction with Paramount was discussed.
6. Does Skydance have any policies, procedures, or guidance related to compliance with 18 U.S.C. 201 or any other laws governing public corruption? If so, please provide a copy of those policies and procedures.
7. Does Skydance conduct any trainings for its staff or executives related to compliance with 18 U.S.C. 201 or any other laws governing public corruption? If so, please provide details regarding these trainings.

## CONCLUSION

Defendant's Response opposing Plaintiff's Request For Judicial Notice should be denied because its clear the facts are related to the integrity and character of the defendants and how they opt to respond or not respond to public and private legal obligations. Further, the above items are evidentiary facts similarly related to the defendants and meet the requirements of Rule 201 of the Federal Rules of Evidence, and therefore, the Court must take judicial notice of them.

Respectfully Submitted,

DATED: July 28, 2025

By /s/ Alfred C. Constants III

Alfred C. Constants III, Esq.  
Constants Law Offices, LLC.  
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Email: Constantslaw49@gmail.com  
*Attorney For Appellant*

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Respectfully Submitted,

DATED: July 28, 2025

By /s/ Alfred C. Constants III  
Alfred C. Constants III, Esq.  
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115 Forest Ave., Unit 331  
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*Attorney For Appellant*

EXHIBITS

EXHIBIT #1

 **Federal Communications Commission**

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EXHIBIT #2

# United States Senate

WASHINGTON, DC 20510

July 21, 2025

David Ellison  
CEO  
Skydance Media  
2900 Olympic Blvd  
Santa Monica, CA 90404

Dear Mr. Ellison:

We write with questions about Skydance Media’s reported secret side deal with President Trump that appears to be connected to Paramount Global’s efforts to settle President Trump’s lawsuit against CBS and secure approval for its mega-merger with Skydance.<sup>1</sup>

In October 2024, President Trump, in his capacity as a private citizen, sued Paramount’s subsidiary CBS over how it allegedly edited a 60 Minutes interview with presidential candidate Vice President Kamala Harris — which Trump claimed were “partisan and unlawful acts of election and voter interference.”<sup>2</sup> CBS has maintained that Trump’s lawsuit is “completely without merit.”<sup>3</sup> The suit was filed after Paramount announced a proposed \$8 billion merger with Skydance.<sup>4</sup> Because the proposed deal involves the transfer of CBS broadcast licenses, President Trump’s Federal Communications Commission must approve the deal before it can proceed.<sup>5</sup>

In May 2025, following reports of possible settlement discussions, we wrote to Paramount regarding concerns that the company’s attempt to settle the “meritless”<sup>6</sup> lawsuit on terms favorable to President Trump could be construed as bribery.<sup>7</sup> We warned Paramount that under

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<sup>1</sup> New York Post, “How secret ‘side deal’ helped seal Paramount’s \$16M settlement with Trump — and here’s who deserves the credit,” Charles Gasparino, July 2, 2025, <https://nypost.com/2025/07/02/media/how-secret-side-deal-helped-seal-paramounts-16m-settlement-with-trump/>.

<sup>2</sup> Trump v. CBS Broadcasting Inc., p. 1, <https://www.courtlistener.com/docket/69332852/1/trump-v-cbs-broadcasting-inc/>.

<sup>3</sup> CBS News, “A statement from 60 Minutes,” October 31, 2024, <https://www.cbsnews.com/news/a-statement-from-60-minutes/>.

<sup>4</sup> Paramount, “Skydance Media and Paramount Global Sign Definitive Agreement to Advance Paramount as a World-Class Media and Technology Enterprise,” press release, July 7, 2024, <https://ir.paramount.com/news-releases/news-release-details/skydance-media-and-paramount-global-sign-definitive-agreement>.

<sup>5</sup> Federal Communications Commission, “Skydance Media and Paramount Global, MB Docket No. 24-275,” <https://www.fcc.gov/transaction/skydance-paramount>.

<sup>6</sup> The Washington Post, “CBS owner Paramount settles Trump lawsuit over Harris interview for \$16M,” Jeremy Barr, July 2, 2025, <https://www.washingtonpost.com/style/media/2025/07/02/paramount-cbs-settlement-trump-harris-interview/>.

<sup>7</sup> Letter from Senator Elizabeth Warren, Senator Bernie Sanders, and Senator Ron Wyden to Paramount Chair Shari Redstone, May 19, 2025, [https://www.warren.senate.gov/imo/media/doc/letter\\_to\\_paramount\\_re\\_cbs\\_lawsuit\\_and\\_corruption.pdf](https://www.warren.senate.gov/imo/media/doc/letter_to_paramount_re_cbs_lawsuit_and_corruption.pdf).

the federal bribery statute, it is illegal to corruptly give anything of value to federal officials to influence an official act<sup>8</sup> — and if Paramount settles the lawsuit in a quid-pro-quo arrangement to influence the Administration’s assessment of the Paramount-Skydance deal, company officials could be breaking the law.<sup>9</sup> Nevertheless, on July 2, 2025, Paramount settled with President Trump for \$16 million.<sup>10</sup> Under the reported terms of the agreement, Paramount will pay Trump’s legal fees, and the remainder of the settlement will go toward his presidential library fund.<sup>11</sup> This settlement came amid reports that “Paramount’s board was concerned that paying [an amount higher than the \$16 million ABC News agreed to pay Mr. Trump in December 2024] to settle the case could increase the company’s exposure to potential legal actions from shareholders accusing it of bribery.”<sup>12</sup>

President Trump himself, however, apparently revealed that the arrangement is worth more than the initially reported \$16 million — reporting suggests the Paramount settlement arrangement may involve an additional back-door deal with President Trump.<sup>13</sup> President Trump has stated that the settlement was worth “about \$16 million plus 16 million, or maybe more than that in advertising... So it’s like \$32 [million] to maybe \$35 million.”<sup>14</sup> This admission appears to corroborate reporting that claims you reached a “side deal” with the President, the terms of which involve CBS airing public service announcements “and other broadcast transmissions” worth between \$15 million and \$20 million that “support conservative causes supported by President Trump.”<sup>15</sup> The nature and existence of this arrangement are uncertain, with at least one anonymous source calling the reports “false.”<sup>16</sup>

On July 17, CBS announced it was canceling The Late Show with Stephen Colbert, the most-watched show on late night television.<sup>17</sup> CBS announced this decision just three days after Colbert criticized Paramount’s \$16 million settlement with President Trump on his show, saying the deal resembled bribery.<sup>18</sup>

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<sup>8</sup> 18 U.S.C. 201.

<sup>9</sup> Letter from Senator Elizabeth Warren, Senator Bernie Sanders, and Senator Ron Wyden to Paramount Chair Shari Redstone, May 19, 2025, [https://www.warren.senate.gov/imo/media/doc/letter\\_to\\_paramount\\_re\\_cbs\\_lawsuit\\_and\\_corruption.pdf](https://www.warren.senate.gov/imo/media/doc/letter_to_paramount_re_cbs_lawsuit_and_corruption.pdf).

<sup>10</sup> The New York Times, “Paramount to Pay Trump \$16 Million to Settle ‘60 Minutes’ Lawsuit,” Benjamin Mullin, Michael M. Grynbaum, Lauren Hirsch, and David Enrich, July 2, 2025, <https://www.nytimes.com/2025/07/02/business/media/paramount-trump-60-minutes-lawsuit.html>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> The Independent, “Trump claims he struck side deal with Skydance for additional \$16 million in ‘60 Minutes’ settlement,” Justin Baragona, July 7, 2025, <https://www.the-independent.com/news/world/americas/us-politics/trump-60-minutes-settlement-skydance-cbs-b2784130.html>.

<sup>14</sup> Variety, “Trump Claims ‘60 Minutes’ Settlement Is Worth as Much as \$35 Million Including ‘Advertising’; Paramount Denies Deal Includes PSAs,” Todd Spangler, July 4, 2025, <https://variety.com/2025/tv/news/trump-60-minutes-lawsuit-settlement-advertising-35-million-paramount-psa-1236447353/>.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> The New York Times, “CBS Canceling ‘Late Show With Stephen Colbert’ After Next Season,” John Koblin, July 17, 2025, <https://www.nytimes.com/2025/07/17/business/stephen-colbert-late-show-ending.html>.

These reports raise fresh questions about corruption in the Trump Administration and President Trump's willingness to accept payments from entities with significant policy interests before agencies he controls. To understand the nature of any payments to President Trump, and whether these payments comply with our nation's anti-bribery laws, we ask that you answer the following questions by August 4, 2025:

1. Is there currently any arrangement under which you or Skydance will provide compensation, advertising, or promotional activities that in any way assist President Trump, his family, his presidential library, or other Administration officials?
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<sup>18</sup> AP News, "Stephen Colbert's 'Late Show' is canceled by CBS and will end in May 2026," David Bauder, Alicia Rancilio, and Andrew Dalton, July 18, 2025, <https://apnews.com/article/stephen-colbert-late-show-cbs-end-8bad9f16f076df62c0ffc50e9c8adbab>.

Sincerely,



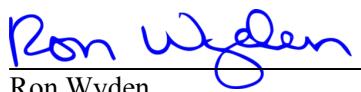
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Elizabeth Warren  
United States Senator



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Bernard Sanders  
United States Senator



Ron Wyden  
United States Senator